

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 23, 1999

Mark Minikello, Treasurer
Federal Credit Union Legislative
Action Fund (Federal CULAF)
33320 9th Avenue So.
Federal Way, WA 98003

Identification Number:

C00064097

Reference:

July Quarterly (4/1/98-6/30/98), October Quarterly (7/1/98-9/30/98), 12

Day Pre-General (10/1/98-10/14/98), 30 Day Post-General (11/3/98-

12/3/98) and Year End (11/24/98-12/31/98) Reports

Dear Mr. Minikello:

This letter is to inform you that as of September 22, 1999 the Commission has not received your response to our requests for additional information dated September 1, 1999. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Debbie A.
 Chacona on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director

Reports Analysis Division



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Taylor O. Brittain, Treasurer Federal Credit Union Legislative Action Fund (Federal CULAF) 33320 9th Avenue So. Federal Way, WA 98003

Identification Number:

C00064097

Reference: October Quarterly Report (7/1/98-9/30/98)

Dear Mr. Brittain:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the

donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

•On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the aggregate year-to-date totals. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers to affiliated committees should be properly disclosed on a separate Schedule B, supporting Line 22 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Debbie A. Chacona

Debbie A. Chacona Senior Reports Analyst Reports Analysis Division